

**EXHIBIT 5-f (PART I) to PLAINTIFFS’
APPENDIX OF EXPERT REPORTS**

From: [McNabb, Kelly K.](#)
To: ["SPetkis@cov.com"](#)
Cc: ["thester@cov.com"](#); [do Amaral, Paulina](#); [Arbitblit, Donald C.](#); ["track2opioddefendants@reedsmith.com"](#); ["mdl2804discovery@motleyrice.com"](#)
Subject: RE: EXTERNAL-CT2: Keyes Materials
Date: Thursday, September 24, 2020 4:01:18 PM
Attachments: [CT2 Keyes Notes.pdf](#)

Counsel,

In response to your below email, attached please find notes of Dr. Katherine Keyes.

Thank you,

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From: 2804 Discovery, MDL [mailto:mdl2804discovery@motleyrice.com]
Sent: Friday, September 18, 2020 10:57 AM
To: MDL 2804
Subject: FW: EXTERNAL-CT2: Keyes Materials

From: Petkis, Steve <SPetkis@cov.com>
Sent: Friday, September 18, 2020 4:56:09 PM
To: 2804 Discovery, MDL <mdl2804discovery@motleyrice.com>;
'track2opioddefendants@reedsmith.com' <track2opioddefendants@reedsmith.com>
Cc: Hester, Timothy <thester@cov.com>
Subject: EXTERNAL-CT2: Keyes Materials

Counsel,

Dr. Keyes's expert report references meetings that she attended with "local city and county officials" in Huntington and Cabell County. See Keyes Rep. at 41, 46. During her deposition in this matter, Dr. Keyes testified that she has preserved notes of those meetings. Defendants request that you promptly produce any notes of the meetings that Dr. Keyes referenced in her report or testimony in this matter.

Best,

Steve

Stephen Petkis

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Huntington meeting

3/4/20

Mayor Steve Williams

Mayor elected in 2012/2013

2016 - Office of Drug control Policy

- local effort

- Michael Bittacelli - Obama
administration

2015 - 480 opioid transports

2016 - 1217 overdose transports

↓
↓
EMS brought to
hospital

↓
24 overdoses in a 5 block radius
the summer that fentanyl
arrived. 4 hour period
→ 2 died b/c used alone

2015 - 2,000 auto injectors of naloxone
paid for by a company

Taylor Wilson - Personal story

key messages

- can't arrest out of the problem
 - Save lives (naloxone) but doesn't promote recovery
 - Now tx promotion
- another evolution is recovery industrial complex

EMS/police — ↑ rates of suicide + PTSD

↳ First responders - developing wellness programs for compassion fatigue

★ "City of Solutions" ★

↳ Huntington not epicenter of heroin epidemic, epicenter of solution to the heroin epidemic.

REDACTED

- every time you get ahead of it,
something else smacks us down

Jan Rador

2017 - more firefighters & EMS
died by suicide than in
the line of duty.

Opioid epidemic is like an onion
and every day there is a
new layer revealed

Scale up of
work force
→ mental
health
→ EMS
→ Bupc

Bupc providers
stigma reduction

Hank Dial

2017 - first responders
had 6 deaths a
month to see - huge
toll on mental health

People who would have been
fire & police are dead &
addicted

even when by hit on RX opioids,
 price wouldn't change on the street

Rocky retired captain
 Commanding the drug unit for
 8 years.

8 guys for entire metro area
 → not a lot of drugs off
 street but didn't make
 a dent

Dr O'Connell - addiction services

SBIRT largest substance use
 grant in university hx

Trained providers

Applied for many grants

PROACT → totally coordinated care
 provider response addiction care tx

Treating the system, not the individual

Whole person wellness.

- family
- housing
- community
- education/employment

Residential family treatment - 6 months

17 family capacity - 12 families now

Bringing Coalitions together

- opposite of addiction is
connection

→ skills, education, work

"Recovery Friendly employers"

- Had no choice as a community
but to do that.

Dr. Hansen - clinical addiction services

- Region has poor mental health

Methamphetamine has started

→ 40% of patients

coming in tx now are

poly w/ meth

★ 6 yr old who overdosed ★

kids

→ ADHD-like symptoms

Autism element -

overstimulated +

problems changing

HIV + Hep C

→ aggressive nature
to it.

PRO ACT

→ 2K intakes last year

→ 150 in January

What works in other communities
don't always work in Appalachia

Data

→ hospitals have multiple data systems

→ data are not linked & coordinated

- What data do we need, and where is it

- prevention - no one wants to pay for it.

- Capture recapture of Cabell county

- triangulate an estimate

→ live births w/ prenatal expen
→ people in tx at a time point
→ survey data sources

List of parameters that are needed

Public Health

- 1) Starts w/ Addiction
- 2) Addiction \rightarrow abuse
- 3) Abuse \rightarrow morbidity
- 4) Morbidity \rightarrow mortality

Vital Stats

ED

IGVIA

NAS

ARCOS

David Chaffin

1998 - 1-2 methadone PDs a year

NAS of Opioid + Gabapentin/
Lamotrigine

Withdrawal from 3 wks to
3 months

NAS 150 per 1000 babies

Nationally it is 30 per 1000

Dr. Wallenberg - rates of weird
infections

↳ Septic endocarditis
d1

REDACTED

National NSDUH
WV NSDUH
Sean Allen

2008 Nat'l NSDUH

{ OUD → Pain Relievers
→ Heroin

State level

Sean Allen

↳ IDU population

REDACTED